

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

AMERICAN REINSURANCE COMPANY,
et al.,

Plaintiffs,

v.

AMERICAN INTERNATIONAL GROUP
and TRENWICK AMERICA
REINSURANCE CORPORATION,

Defendants.

CIVIL ACTION NO: 05-11840-MLW

**ASSENTED TO MOTION TO FILE UNDER SEAL DEFENDANT TRENWICK
AMERICA REINSURANCE CORPORATION'S MEMORANDUM IN SUPPORT OF
ITS RENEWED MOTION TO STAY PROCEEDINGS PENDING ARBITRATION AND
IN OPPOSITION TO PLAINTIFFS' RENEWED MOTION FOR REMAND**

Defendant Trenwick America Reinsurance Corporation ("Trenwick") hereby moves to
file under seal the following pleading:

- **TRENWICK AMERICA REINSURANCE CORPORATION'S
MEMORANDUM IN SUPPORT OF ITS RENEWED MOTION TO STAY
PROCEEDINGS PENDING ARBITRATION AND IN OPPOSITION TO
PLAINTIFFS' RENEWED MOTION TO REMAND.**

Trenwick respectfully requests permission to file this pleading under seal because it
references material submitted in connection with a confidential arbitration between plaintiffs and
co-defendant, American International Group ("AIG"). In accordance with the Local Rules,
Trenwick respectfully request that this pleading be impounded until the final resolution of this
litigation between the parties, at which time it will be retrieved by counsel for Trenwick.

WHEREFORE, it is respectfully requested that the Court grant this assented-to motion to
file the above-described document under seal.

Certification Pursuant to Local Rule 7.1

Trenwick's counsel certifies that pursuant to Local Rule 7.1, counsel for Trenwick and the Plaintiffs have conferred regarding the issue presented by this motion, and Plaintiffs' counsel assented to this motion.

**TRENWICK AMERICA
REINSURANCE CORPORATION**

By its attorneys,

/s/ Eben A. Krim
Mark W. Batten BBO #566211
Eben A. Krim BBO #652506
PROSKAUER ROSE LLP
One International Place, 22nd floor
Boston, MA 02210
(617) 526-9700

Of Counsel:
Ronald S. Rauchberg
Margaret A. Dale
David L. Shaul
PROSKAUER ROSE LLP
1585 Broadway
New York, New York 10036
(212) 969-3000

Dated: January 19, 2006

CERTIFICATE OF SERVICE

I, Eben A. Krim, counsel for Defendant Trenwick America Reinsurance Corporation, hereby certify that on January 19, 2006, I served a copy of the foregoing document by overnight delivery on all known counsel of record.

/s/ Eben A. Krim
Eben A. Krim